



Ingersoll Rand (NYSE:IR) advances the quality of life by creating and sustaining safe, comfortable and efficient environments. Our people and our family of brands—including Club Car®, Ingersoll Rand®, Schlage®, Thermo King® and Trane® — work together to enhance the quality and comfort of air in homes and buildings; transport and protect food and perishables; secure homes and commercial properties; and increase industrial productivity and efficiency. We are a \$14 billion global business committed to a world of sustainable progress and enduring results.



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Our Code of Conduct

A Guide to Legal and Ethical Standards
for All Employees



June 2012

Dear Colleague:



For 141 years, Ingersoll Rand has delivered superior products, services and solutions for our customers. Our core values—Integrity, Respect, Teamwork, Innovation and Courage—are the foundation of our enduring success. Together, these values strengthen the bond of trust with one another, our customers, suppliers, shareholders and the communities in which we operate. We lead our list of values with integrity because that is the way we must lead our company. Our reputation and credibility depend on it.

Recently, we took the opportunity to revisit this set of core values, and, with input from many of you, we confirmed that they continue to define and guide the Ingersoll Rand of today. These values keep us focused on our Vision: a world of sustainable progress and enduring results.

The Ingersoll Rand Code of Conduct describes the fundamental behaviors and rules that align with our core values and ensures that we are all following our core values in everything we do. Each and every one of us must be familiar with and adhere to our Code—no exceptions.

Some of these rules reinforce legal imperatives in the places where we do business. More importantly, *all* of these rules mirror our commitment to fairness, honesty and ethical business practices. Following our Code is not merely the right thing to do. Doing so helps us on our path to premier performance by creating lasting trust between the Company and all our stakeholders, and by avoiding the legal, regulatory and reputational costs that come with non-compliance.

If you ever have a question or concern about an ethics or compliance issue, promptly raise it. As explained in the Code of Conduct, there are a variety of ways for you to do so; and you will not suffer negative consequences for speaking up truthfully about a concern. To the contrary, raising issues is essential when you are not sure about the right thing to do, or if you suspect someone else is not living up to our core values. By following the Code and speaking up when necessary, each of you safeguards Ingersoll Rand's reputation for integrity and enables us to achieve enduring results.

Sincerely,



Mike Lamach
Chairman and Chief Executive Officer

Where to Find Help

Ingersoll Rand has many resources available to guide employees in ethical and compliance situations.

Employees wishing to seek guidance or to report concerns may do so by discussing the issue with a manager, supervisor, Human Resources representative, a member of the Ethics and Compliance Group or by contacting the Ethics HelpLine via the email address, internet address, or telephone numbers listed below.

Email: Ethics@irco.com

Telephone: **Ethics HelpLine**

Belgium – 0800-7-7802

Brazil – 0800-892-1670

Canada – 1-855-IR-ETHICS

China – (21) 2208-1443

Czech Republic – 800-143-915

France – 0800-90-4679

Germany – 0800-187-3002

India – (080) 43427020

Ireland – 1-800-571-014

Italy – 800-789-212

Mexico – 001-877-557-2683

Spain – 900-9-81208

Russia – Moscow: First dial 363-2400, then dial 877-557-2683

All Other Locations: First Dial 8, pause a moment, then dial 10-800-110-1011, then dial 877-557-2683 (St. Petersburg – West Call Only)

United Arab Emirates – First dial 800-0021, then dial 877-557-2683

United Kingdom – 0808-234-5415

United States – 1-855-IR-ETHICS

Turkey – First dial 0811-288-0001, then dial 877-557-2683

All Other Locations – +1-770-613-6310 (Call Collect/Reverse Charges)

Online: Submit a confidential report through the internet at ingersollrand.com/helpline.